

Remarks

The Office Action mailed April 14, 2006 has been carefully reviewed and the foregoing amendments have been made in consequence thereof.

Claims 1-31 are pending in this application. Claims 1-31 stand rejected.

The rejection of Claims 1-31 under 35 U.S.C. § 112, second paragraph, is respectfully traversed. Applicants respectfully submit that Claims 1-31 satisfy section 112, second paragraph. More specifically, Applicants respectfully submit that Claims 1-31 are definite and particularly point out and distinctly claim the subject matter of the invention. Applicants, however, have amended independent Claims 1, 11, 21, and 31 to address the issues raised in the Office Action. Accordingly, Applicants respectfully submit that Claims 1-31 are definite and particularly point out and distinctly claim the subject matter of the invention. For at least the reasons set forth above, Applicants respectfully request that the rejection of Claims 1-31 under 35 U.S.C. § 112, second paragraph, be withdrawn.

The rejection of Claims 1-31 under 35 U.S.C. § 101 as being directed to non-statutory subject matter is respectfully traversed.

The Office Action asserts that “independent Claims 1 & 31 recite steps that manipulate characteristic data obtained by analyzing assets in a portfolio to arrive at a value of a response variable for some assets in the portfolio...The steps of Claims 1 & 31 are essentially steps in a mathematical algorithm, which is an abstract idea...The question is then whether the method is useful, concrete and tangible.” The Office Action further states that “the displaying of groups does [not] confer any benefit or serve an apparent purpose...Thus, the claims do not recite any utility that is specific, substantial or credible.” Applicants respectfully traverse these assertions.

Applicants respectfully submit that Claims 1 and 31 are directed to a method that produces a useful, concrete and tangible result. For example, Claim 1 recites a “method for correlating descriptive attributes of a portfolio of assets for valuation of the assets included within the portfolio”. Applicants submit that valuing assets included within a portfolio is a useful, concrete and tangible result.

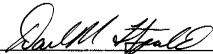
Moreover, Claim 1 recites a “at least one of fully underwriting each asset individually included within the first valuation portion of the asset portfolio, and grouping and underwriting a sample of assets included within the first valuation portion of the asset portfolio and *computing a value for each asset included within the first valuation portion of the asset portfolio...statistically inferring, using the computer, a value for each asset included within the second valuation portion of the asset portfolio* by performing a correlation process....” (Emphasis added.) Applicants submit that computing a value for each asset included with the first valuation portion and statistically inferring a value for each asset included in the second valuation portion produces a useful, concrete and tangible result.

In addition, Applicants have amended independent Claims 1 and 31 to include “the correlation process including the steps of...grouping the assets included within the second valuation portion according to the calculated value of the response variable...and outputting the groupings for further analysis.” Accordingly, Claims 1 and 31 recite that the groupings of the assets included within the second valuation portion are outputted for further analysis, which is a tangible result.

For at least the reasons set forth above, Applicants respectfully request that the Section 101 rejection of Claims 1-31 be withdrawn.

In view of the foregoing amendments and remarks, all the claims now active in this application are believed to be in condition for allowance. Reconsideration and favorable action is respectfully solicited.

Respectfully Submitted,


Daniel M. Fitzgerald
Registration No. 38,880
ARMSTRONG TEASDALE LLP
One Metropolitan Square, Suite 2600
St. Louis, Missouri 63102-2740
(314) 621-5070